IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ROME DIVISION

LORI WRIGHT and TEDDY E. WRIGHT, as Next Friends and * Parents of Destin Wright, Deceased * \star * Plaintiffs, \star CIVIL ACTION FILE × NO.: 4:15-CV-00059-HLM VS. × × JOHNNY MOATS, Individually and in his Official Capacity as Polk County * Sheriff; J. KELLY MCLENDON, * Individually and in His Official Capacity as Polk County Sheriff; POLK COUNTY,* GEORGIA; SOUTHERN HEALTH PARTNERS, INC.; K. HEATH, LPN; SHANNON TURNER, LPN; J. THOMAS, LPN; and BETTY × FOWLER, LPN in their Individual * Capacities; JOHN DOES I, II, and × JANE DOES I, II, and III, in their × **Individual Capacities** * * Defendants. ×

PLAINTIFF TEDDY E. WRIGHT'S AMENDED NOTICE OF VIDEO DEPOSITION OF JOHNNY MOATS

To: Johnny Moats
c/o Gary Kevin Morris
Williams, Morris & Waymire, LLC
4330 South Lee Street, NE
Building 400, Suite A
Buford, GA 30518

You are hereby noticed that on **October 17**, **2016**, beginning at **10:00 A.M.**, at Gammon, Anderson & McFall, 105 Prior Street, Cedartown, Georgia 30125, counsel for Plaintiff will proceed to take the video deposition of **JOHNNY MOATS**, upon oral examination for the purposes of discovery and all other purposes allowed under the law, pursuant to Federal Rules of Civil Procedure Rules 26 and 30. The video deposition will be taken before an officer duly authorized to administer oaths and to take depositions. The video deposition will be recorded stenographically. The oral examination will continue from day to day until its completion.

This 14th day of October, 2016.

/s/ Robert K. Finnell

Georgia State Bar No. 261575 The Finnell Firm

P.O. Box 63

Rome, Georgia 30162-0063

Phone: 706-235-7272 / Fax: 706-235-9461

Email: bob@finnellfirm.com Attorney for Teddy E. Wright

/s/ H.L. Cromartie, III

Georgia State Bar No. 197190

H.L. Cromartie III, P.C.

P.O. Box 1897

Rome, Georgia 30162-1897

Phone: 706-802-0251 / Fax: 706-802-0252

Email: rick@hlcromartielaw.com Attorney for Teddy E. Wright

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for Defendant with a true and exact copy of the PLAINTIFF TEDDY E. WRIGHT'S AMENDED NOTICE TO TAKE VIDEO DEPOSITION OF JOHNNY MOATS, by filing same with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorney of record:

Clarence Victor Long Office of C. Victor Long 4995 Erin Road Atlanta, GA 30331

Natalie Denese Gatson Law Offices of Natalie Gatson P.O. Box 310928 120 North McDonough Street Atlanta, GA 30331

Shira Adler Crittendon Schreeder Wheeler & Flint, LLP 1100 Peachtree Street, NE, Suite 800 Atlanta, GA 30309-4516

This 14th day of October, 2016.

Jennifer Jenivene Neal-Jones Neal Jones & Handrick Law, LLC 180 Camden Hill Road, Suite D Lawrenceville, GA 30046

Gary Kevin Morris Williams, Morris & Waymire, LLC 4330 South Lee Street, NE Building 400, Suite A Buford, GA 30518

/s/ H.L. Cromartie, III

H.L. Cromartie, III

Georgia State Bar No: 197190

Attorney for Plaintiff

CERTIFICATE OF COMPLIANCE WITH LR 5.1(C)

This is to certify that the foregoing pleading was prepared using Times New Roman 14 point in accordance with LR 5.1(C).

H.L. CROMARTIE III, P.C.

/s/ H.L. Cromartie, III

H.L. Cromartie, III

Georgia State Bar No: 197190

Attorney for Plaintiff